

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |   |
|-----------------------------------|---|---|
| In re:                            | ) | Chapter 11                                      |
|                                   | ) |   |
| W.R. Grace & Co., <u>et al.</u> , | ) | Case No. 01-01139 (JKF)                         |
|                                   | ) | (Jointly Administered)                          |
|                                   | ) |   |
| Debtors.                          | ) | <b>Objection Deadline: 10/23/2007 @ 4:00 pm</b> |
|                                   | ) | <b>Hearing Date: TBD only if necessary</b>      |

**SUMMARY OF THE APPLICATION OF WILLIAM D. SULLIVAN, LLC  
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES AS ZAI LOCAL COUNSEL FOR THE INTERIM PERIOD  
FROM APRIL 1, 2007 THROUGH APRIL 30, 2007**

|  |   |
|--|---|
| Name of Applicant:   | William D. Sullivan, LLC                |
| Authorized to Provide Professional Services to:  | Zonolite Attic Insulation Claimants     |
| Date of Appointment:   | July 22, 2002 <sup>1</sup>              |
| Period for which compensation and<br>Reimbursement is sought:  | April 1, 2007 through<br>April 30, 2007 |
| Amount of Compensation sought as actual,<br>Reasonable, and necessary:   | \$ 5,842.50                             |
| Amount of Expenses Reimbursement:  | \$ 62.40                                |
| This is a: <input checked="" type="checkbox"/> monthly <input type="checkbox"/> quarterly <input type="checkbox"/> final application |   |
| Prior Application filed: Yes.  |   |

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<sup>1</sup> William D. Sullivan presently serves as Delaware Counsel to the ZAI Claimants, through the firm of William D. Sullivan, LLC. Mr. Sullivan was designated as Delaware Counsel to the ZAI Claimants by Edward Westbrook, Lead Counsel to the ZAI Claimants, pursuant to the ZAI Claimants' Revised Special Counsel Designation and Litigation Budget for the ZAI Science Trial (D.I. 2508). The ZAI Claimants Revised Designation was approved by the Court by Order dated August 26, 2002 (D.I. 2617). Mr. Sullivan was previously employed by the firms of Elzufon Austin Reardon Tarlov and Mondell (through September 20, 2004) and Buchanan Ingersoll (September 20, 2004 through July 21, 2006). Those firms are no longer involved in the representation of the ZAI Claimants.

This is the ninth application of William D. Sullivan, LLC ("Sullivan") for monthly interim compensation of services filed with the Bankruptcy Court in this Chapter 11 case. The status of previous applications filed by Sullivan is set forth below:

| Date Filed | Period Covered   | Requested Fees | Requested Expenses | Status of Fees                  | Status of Expenses              |
|------------|------------------|----------------|--------------------|---------------------------------|---------------------------------|
| 11/3/06    | 7/24/06-8/31/06  | \$1,950.00     | \$0.00             | No objections served on counsel | No objections served on counsel |
| 11/3/06    | 9/1/06-9/30/06   | \$390.00       | \$0.00             | No objections served on counsel | No objections served on counsel |
| 1/3/07     | 10/1/06-10/31/06 | \$390.00       | \$0.00             | No objections served on counsel | No objections served on counsel |
| 1/3/07     | 11/1/06-11/30/06 | \$3,330.00     | \$329.52           | No objections served on counsel | No objections served on counsel |
| 3/12/07    | 12/1/06-12/31/06 | \$7,702.50     | \$863.59           | No objections served on counsel | No objections served on counsel |
| 3/12/07    | 1/1/07-1/31/07   | \$7,248.75     | \$13.92            | No objections served on counsel | No objections served on counsel |
| 3/29/07    | 2/1/07-2/28/07   | \$1,102.50     | \$882.00           | No objections served on counsel | No objections served on counsel |
| 7/20/07    | 3/1/07-3/31/07   | \$8,591.25     | \$5,143.33         | No objections served on counsel | No objections served on counsel |

The total expended for the preparation of this application is approximately 1.5 hours, and the corresponding estimated compensation *that will be requested in a future application* is approximately \$450.00.

The Sullivan attorneys who rendered professional services in these cases during the Fee Period are:

| Name of Professional Person | Position with the applicant | Number of years as an attorney | Department | Hourly billing rate | Total billed hours | Total compensation |
|-----------------------------|-----------------------------|--------------------------------|------------|---------------------|--------------------|--------------------|
| William D. Sullivan         | Partner                     | 17                             | Bankruptcy | \$300.00            | 16.7               | \$5,010.00         |
| Elihu E. Allinson           | Associate                   | 10                             | Bankruptcy | \$225.00            | 3.7                | \$832.50           |
| TOTALS                      |                             |                                |            |                     | 20.4               | \$5,842.50         |

No paraprofessional rendered professional services in these cases during the Fee Period.

#### Compensation by Project Category

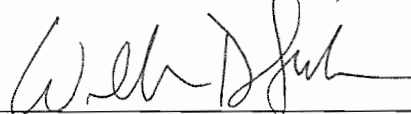
| Category               | Total Hours | Total Fees |
|------------------------|-------------|------------|
| 11 - Fee Applications  | 0.0         | \$0.00     |
| 20-Travel-Non-working  | 0.0         | \$0.00     |
| 22 - ZAI Science Trial | 20.4        | \$5,842.50 |
| TOTALS                 | 20.4        | \$5,842.50 |

## 11 - Fee Applications, Applicant

| <u>Description</u>                    | <u>Amount</u> |
|---------------------------------------|---------------|
| Outside Copying and Service by Vendor | \$62.40       |
| Courier Service                       | \$0.00        |
| Copying - In-house (\$0.07 per page)  | \$0.00        |
| Postage                               | \$0.00        |
| On-line Search Service (CM/ECF)       | \$0.00        |
| Total                                 | \$62.40       |

Dated: October 3, 2007  
Wilmington, Delaware

**WILLIAM D. SULLIVAN, LLC**



William D. Sullivan (No. 2820)  
4 East 8<sup>th</sup> Street, Suite 400  
Wilmington, DE 19801  
Telephone: (302) 428-8191  
Facsimile: (302) 428-8195

Delaware Counsel for the ZAI Claimants

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|                                   | ) |   |
| Debtors.                          | ) | <b>Objection Deadline: 10/23/2007 @ 4:00 pm</b> |
|                                   | ) | <b>Hearing Date: TBD only if necessary</b>      |

**FEE DETAIL FOR THE APPLICATION OF WILLIAM D. SULLIVAN, LLC  
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES AS ZAI LOCAL COUNSEL FOR THE INTERIM PERIOD FROM  
APRIL 1, 2007 THROUGH APRIL 30, 2007**

**William D Sullivan, LLC**

4 East 8th Street, Suite 400

Wilmington, DE 19801

Tel: (302) 428-8191

Fax:(302) 428-8195

Tax ID # 20-5238500

William Sparks  
W.R. Grace & Co.  
7500 Grace Dr.  
Columbia MD 21044

July 20, 2007

Invoice # 10188

**In Reference To: W.R. Grace - ZAI Claimants  
C.A. 01-01139 (JKF)**

## Professional Services

|   | <u>Hours</u> | <u>Amount</u> |
|---|--------------|---------------|
| 4/2/2007 WDS Review revised agenda for hearing  | 0.10         | 30.00         |
| WDS Attend omnibus hearing  | 3.00         | 900.00        |
| WDS Review Order approving 22nd Fee Applications; forward to co-counsel   | 0.20         | 60.00         |
| 4/3/2007 WDS Correspondence from E. Westbrook re: future issues for ZAI Claimants   | 0.20         | 60.00         |
| WDS Review draft motion for reconsideration   | 0.60         | 180.00        |
| WDS Further review of caselaw and standards for decision on reargument  | 1.40         | 420.00        |
| 4/4/2007 WDS Review cases and evidence cited re: basis for reconsideration; telephone conversation with E. Westbrook re: same | 2.50         | 750.00        |
| WDS Review revised motion, final proofread; telephone conversation with co-counsel re: same; file and serve                   | 1.30         | 390.00        |
| WDS Legal research re: claims disallowance and appeal procedures  | 1.50         | 450.00        |
| 4/9/2007 WDS Review agenda for April 13 hearing, no matters affecting ZAI   | 0.10         | 30.00         |
| 4/10/2007 WDS Review miscellaneous pleadings re: claims and discovery issues  | 0.30         | 90.00         |
| WDS Telephone conversation with counsel for Canadian ZAI Claimants re: status   | 0.20         | 60.00         |
| 4/17/2007 WDS Review Debtor's response to motion for reargument; forward to co-counsel  | 0.40         | 120.00        |
| 4/19/2007 WDS Review order denying reconsideration; forward to co-counsel   | 0.20         | 60.00         |
| 4/24/2007 WDS Correspondence with co-counsel re: status conference preparation  | 0.20         | 60.00         |

ZAI Claimants

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|           |  | <u>Hours</u> | <u>Amount</u>     |
|-----------|--|--------------|-------------------|
| 4/25/2007 | WDS Correspondence with E. Westbrook re: discovery   | 0.20         | 60.00             |
|           | WDS Review agenda for May 2 hearing; correspondence with co-counsel re: same                       | 0.20         | 60.00             |
|           | WDS Review and revise interrogatories on class action issues                                       | 0.60         | 180.00            |
| 4/26/2007 | EEA Discuss discovery requests with W. Sullivan  | 0.10         | 22.50             |
|           | EEA Discuss discovery requests with Ed Westbrook   | 0.10         | 22.50             |
|           | WDS Review of cases relating to ZAI issues   | 1.20         | 360.00            |
| 4/27/2007 | EEA Discuss discovery with W. Sullivan   | 0.25         | 56.25             |
|           | EEA Prepare discovery for service  | 1.00         | 225.00            |
|           | EEA Forward discovery to Ed Westbrook; inquire as to Rule 30(b)(6) deposition and subpoena         | 0.30         | 67.50             |
|           | EEA Draft Rule 30(b)(6) Notice of Deposition   | 0.75         | 168.75            |
|           | EEA Prepare Rule 45 subpoena; file and serve   | 1.00         | 225.00            |
|           | WDS Meeting with E. Westbrook re: review of procedural issues in preparation for status conference | 1.50         | 450.00            |
|           | WDS Review issues with E. Allinson re: service of discovery, discovery issues                      | 0.30         | 90.00             |
| 4/28/2007 | WDS Conference with E. Westbrook re: procedural chart for ZAI; propose revisions                   | 0.50         | 150.00            |
| 4/30/2007 | EEA Telephone message from, telephone call to and e-mail to Jan Baer re: discovery requests        | 0.10         | 22.50             |
|           | EEA E-mail J. Fitzgerald address information to co-counsel for hearing in Pittsburgh               | 0.10         | 22.50             |
|           | For professional services rendered   | <u>20.40</u> | <u>\$5,842.50</u> |
|           | Additional Charges :   |              |                   |
| 4/4/2007  | Motion for Reconsideration of Order  |              | 29.28             |
| 4/27/2007 | Notices and Requests for Production, Requests to Admit, First Set of Interrogatories               |              | 33.12             |
|           | Total additional charges   |              | <u>\$62.40</u>    |
|           | Total amount of this bill  |              | <u>\$5,904.90</u> |

## Timekeeper Summary

| <u>Name</u>        | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|--------------------|--------------|-------------|---------------|
| William D Sullivan | 16.70        | 300.00      | \$5,010.00    |
| Zeke Allinson      | 3.70         | 225.00      | \$832.50      |

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|                                   | ) |   |
| Debtors.                          | ) | <b>Objection Deadline: 10/23/2007 @ 4:00 pm</b> |
|                                   | ) | <b>Hearing Date: TBD only if necessary</b>      |

**VERIFICATION OF THE APPLICATION OF WILLIAM D. SULLIVAN, LLC  
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES AS ZAI LOCAL COUNSEL FOR THE INTERIM PERIOD  
FROM APRIL 1, 2007 THROUGH APRIL 30, 2007**

I, William D. Sullivan, do hereby verify the following with respect to the Application Of William D. Sullivan, LLC ("Sullivan") For Compensation For Services And Reimbursement Of Expenses As ZAI Local Counsel For The Interim Period From April 1, 2007 Through April 30, 2007:

1. I am an attorney with the applicant law firm, William D. Sullivan, LLC, admitted to appear before this Court.

2. I personally performed many of the legal services for which Sullivan is seeking interim compensation and am thoroughly familiar with the other work performed on behalf of the ZAI Claimants by the other Sullivan attorneys for whose work compensation is being sought.

3. I have reviewed the foregoing application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. I am familiar with Del.Bankr.L.R. 2016-2 and have reviewed the Court's *Amended Administrative Order Under 11 U.S.C. §§ 105(a) and 331 Establishing Revised Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Official Committee Members*, signed April 17,

2002, and believe that the foregoing application substantially complies with Rule 2016-2 and the Order.

Dated: October 3, 2007  
Wilmington, Delaware

WILLIAM D. SULLIVAN, LLC

A handwritten signature in black ink, appearing to read 'William D. Sullivan', is written over a horizontal line.

William D. Sullivan (No. 2820)  
Elihu E. Allinson, III (No. 3476)  
4 East 8<sup>th</sup> Street, Suite 400  
Wilmington, DE 19801  
Telephone: (302) 428-8191  
Facsimile: (302) 428-8195

Delaware Counsel for the ZAI Claimants